



Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington D.C. 20554

Annual 47 C.F.R. 64.2009(e) CPNI Certification  
EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2008

Date Filed: February 22, 2008

Name of company covered by this certification: **Bettles Telephone, Inc**

Form 499 filer ID: **804804**

Name of Signatory: Michael Garrett

Title of Signatory: Executive Vice President

I, Michael Garrett, Executive Vice President of Bettles Telephone Inc. ("BTI"), certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules.

Included with this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001et seq. of the Commission's rules.

BTI has not taken any actions against data brokers in the past year nor has BTI received any customer complaints related to unauthorized access to CPNI, or unauthorized disclosure of CPNI.

Sincerely,

Michael Garrett  
Executive Vice President  
Bettles Telephone Company, Inc.  
(800) 982-0136 X160  
[mike.g@aptalaska.com](mailto:mike.g@aptalaska.com)



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**Bettles Telephone, Inc. (Filer ID 804804) CPNI Operating Statement**

As shown in the attached CPNI company policy, Bettles Telephone Inc. ("BTI"), a subsidiary of Alaska Power & Telephone ("AP&T"), does not use customer CPNI in marketing campaigns and no AP&T employee/owner is authorized to sell or distribute CPNI data. At this time, BTI does not offer on-line access to customer account information.

Employees have received and will continue to receive training in the handling of CPNI. All employees have received a copy of the attached CPNI policy. Employees are instructed to report any suspected CPNI violations to the corporate office which will then proceed with FCC reporting regulations.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Garrett", is written over the typed name.

Michael Garrett  
Executive Vice President  
Bettles Telephone Company, Inc.  
(800) 982-0136 X160  
[mike.g@aptalaska.com](mailto:mike.g@aptalaska.com)

**ALASKA TELEPHONE COMPANY  
BETTLES TELEPHONE, INC  
NORTH COUNTRY TELEPHONE, INC  
(COLLECTIVELY REFERRED TO AS AP&T)**

<b>Subject:</b> <b>CPNI</b> <b><u>Customer Proprietary</u></b> <b><u>Network Information</u></b>	<b>Class:</b>  Customer Service		<b>Number:</b>  CS-01-001
	<input type="checkbox"/> Complete Revision <input checked="" type="checkbox"/> Partial Revision <input type="checkbox"/> New	<b>Supersedes:</b>  Any previous practice	<b>Page:</b>  1

**Purpose:**

To document the policy and procedures for handling Customer Proprietary Network Information (CPNI) in accordance with the Federal Communications (FCC) rules.

**CPNI Definition:**

CPNI is information that relates to the quantity, technical configuration, type, destination, location, and amount of use of a telecommunications service subscribed to by any customer of a telecommunications carrier and that is made available to the carrier by the customer solely by virtue of the carrier-customer relationship.

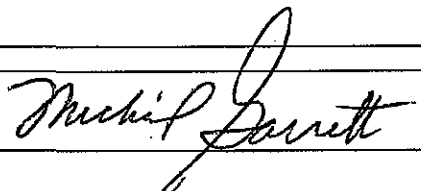
Information contained in the bills pertaining to telephone exchange service or telephone toll service.

Information such as the phone numbers called by a consumer, the frequency, duration, and timing of such calls.

Services purchased by the consumer, such as call waiting.

**Statement of Policy:**

AP&T will not use customer CPNI data for marketing purposes and no AP&T employee/owner is authorized to sell or distribute CPNI data. AP&T employees will not release CPNI detail information during customer-initiated telephone contact without first establishing the identity of the caller by use of one of the approved FCC methods listed under the procedures below. Violation of these rules will bring strict disciplinary action as set forth in the AP&T Employee Manual.

<b>Issue Date:</b> 10/29/2007	<b>Effective Date:</b> 10/29/2007	<b>Approved by:</b> <b>Executive Vice President:</b> 
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**ALASKA TELEPHONE COMPANY  
BETTLES TELEPHONE, INC  
NORTH COUNTRY TELEPHONE, INC  
(COLLECTIVELY REFERRED TO AS AP&T)**

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**Practice:**

**Responsibility**

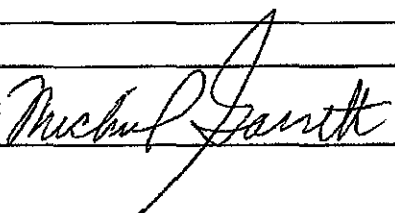
**Action**

All AP&T Employees

1. Establish caller identity prior to the release of CPNI data during customer-initiated telephone contact. Per FCC rules, in the absence of a pre-established password, the following procedures may be used to verify the caller identity or release requested CPNI data:

- \* The customer requested CPNI data may be mailed to the address of record.
- \* The AP&T employee may call the customer back at the telephone number on record and disclose the call detail information.
- \* The customer may come into the AP&T office with a valid photo ID and discuss or pick up the requested information.

2. CPNI information may be disclosed as required by law enforcement.

<b>Issue Date:</b> 10/29/2007	<b>Effective Date:</b> 10/29/2007	<b>Approved by:</b> <b>Executive Vice President:</b> 
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